

DESCRIPTION OF SWMU #10

One new SWMU, (SWMU #10), was identified during the site visit that was not present when the PA/SI was completed by GCA in 1986. Since slurry production ceased, Raymark has been accumulating dry particulate asbestos/lead waste in bags on an asphalt parking lot in the northeast corner of the facility (see Figure 2-2). Raymark's Facility Engineering Manager informed GCL that the lead content of the waste was determined to be non-toxic, per EP Toxicity test methods. Hence, according to Raymark, the lead content would not make the waste hazardous. GCL was provided with no analytical evidence to confirm or refute this claim. The issue of concern is that asbestos particulates, and even low levels of lead, constitute a health hazard with the potential to contaminate air. Therefore, the storage area is being considered a SWMU.

The bags assume a somewhat rectangular shape when full and are approximately 4 feet tall by 3 feet wide and made of woven fiber. At the time of the site visit approximately 150 of the bags on pallets were being stored on the asphalt parking lot. All the bags appeared to be of sound structural integrity and there was no visual evidence that the bags had been punctured or opened. Therefore, GCL determined that samples were not necessary from this unit.

Raymark's Facility Engineering Manager informed GCL that the waste will be stored at this site longer than 90 days. The reason for this is that Raymark is in the process of developing techniques for recycling the lead asbestos fiber waste back into the manufacturing process. However, to date, this has not been accomplished. There was no information on how long the wastes will be stored on-site.

*Description of
SWMU #10
B-1*

1/27/92